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Dee May
Director
Federal Regulatory Issues

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

May 16, 1996

Ex Parte

Mr. William F. Caton
Acting Secretary
Federal Communications Commissions
1919 M Street, N.W.
Room 222
Washington, D.C. 20554

Ex Parte

Re: Channel Assignment to the Point of Termination, CC 93-162 Expanded Interconnection

Dear Mr. Caton:

Please find attached a written ex parte filed with Mr. Paul D'Ari of the Common Carrier Bureau in the above proceeding. Please feel free to contact me with any questions.

Sincerely,

Dee May

Attachment

cc: P. D'Ari
R. Keeney
K. Levitz
R. Metzger
G. Matise
J. Schlichting

No. of Copies rec'd 0+1
List ABCDE

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Dee May
Director
Federal Regulatory Issues

NYNEX

May 16, 1996

Mr. Paul D'Ari
Tariff Division-Common Carrier Bureau
Federal Communications Commission
Room 515
1919 M Street, NW
Washington, DC 20554

Ex Parte

Re: Channel Assignment to the Point of Termination, CC 93-162 Expanded Interconnection

Mr. D'Ari,

TCG filed an ex-parte on May 3, 1996, in which they argue for control of channel assignments up to the Main distributing frame (MDF) and, in addition, state that the "POT Bay (Point of Termination) serves no useful function whatsoever. Furthermore, TCG claims to have assignment control to the MDF in New York already. These statements are inaccurate.

First, The POT Bay provides exactly what TCG wants a single point of termination for all of its services. TCG incorrectly assumes that all of their circuits, Voice Grade, DS0, DS1 and DS3, currently terminate at a single MDF, regardless of the level of transmission and/or the end point of the circuit. This is simply not the case. NYNEX designs the circuit from the specific end user or switch, to a point at the POT Bay. TCG simply provides the connection at the POT Bay. As detailed in "The POT Bay Story" (attached), this single point of termination permits the collocated customer to maintain assignment control over its entire network, thus efficiently utilizing their equipment.

Currently, in New York, there is a joint assignment control process which requires manual intervention by New York Telephone and was developed for all collocated customers to use. The Collocator's cable to its equipment and the NYNEX cable from the POT Bay are identified using the same numbering scheme and are cross connected, one-for-one, at time of installation. As a result, when the collocator provides its assignment at the POT Bay, this is translated to the NYNEX assignment in the Operational Support System ("OSSs"). However, this cable does not necessarily terminate at a single MDF. In most cases, it is terminated at a Intermediate Distributing Frame (IDF). These frames are inventoried and assigned by NYNEX and can provide access to other elements, including DSX1s, DSX3s, additional MDFs, switching equipment and subscriber cables. Therefore, NYNEX assigns and designs a circuit from a customer's location up to and including the NYNEX cable to the POT Bay. This arrangement provides the maximum amount of flexibility for both the collocator and

NYNEX and additionally, allows both of us to maintain assignment control over our own network facilities. As a matter of fact, for the reasons stated above, TCG could effectively lose efficiency by terminating its equipment directly on NYNEX's MDFs.

The NYNEX New England provisioning processes were developed at a later date through a negotiated process which included the collocators and differs form New York in one key area only. TCG still has control over its own network but must wait for a Design Layout Report from New England Telephone before completing a connection. To date, collocated customers and New England Telephone have been working cooperatively to ensure fast turn around of circuit provisioning and efficient use of each other's network facilities. However, NYNEX New England maintained control over the cable and pairs to the POT Bay in order to continue to utilize the mechanized OSS solutions that were available at the time

Several months ago, NYNEX began investigating a mechanized solution to the assignment issue for all collocators to use in the entire region. As a result of a work effort by a group of specialists in NYNEX, a mechanized solution to the assignment control issue has been found. This solution will cost approximately $300,000 and require 90 days from the time the software is installed and tested in the OSS. It will allow the collocator to process orders for service in a mechanized manner while controlling the assignment at the Point Of Termination. NYNEX is in the process of ordering the software solution.

This solution will not affect the assignment control issue as it pertains to NYNEX multiplexed services. Contrary to TCG's ex parte, collocated customers already have assignment control in the NYNEX region when their service includes a central office multiplexing option. All customers whose service includes this option provide assignments to NYNEX via a mechanized order flow utilizing a Channel Facility Assignment (CFA) process.

Please feel free to call me if you have any questions.

Sincerely,

Enclosure

The "POT Bay": The NYNEX Story

July 16, 1993

Telesector Resources Group Inc.
a subsidiary of New England Telephone
and New York Telephone

Summary:

In this paper, the NYNEX Telephone Companies (NTCs), explain their position concerning the use of a POT Bay as a point of termination within an NTC Serving Wire Center.

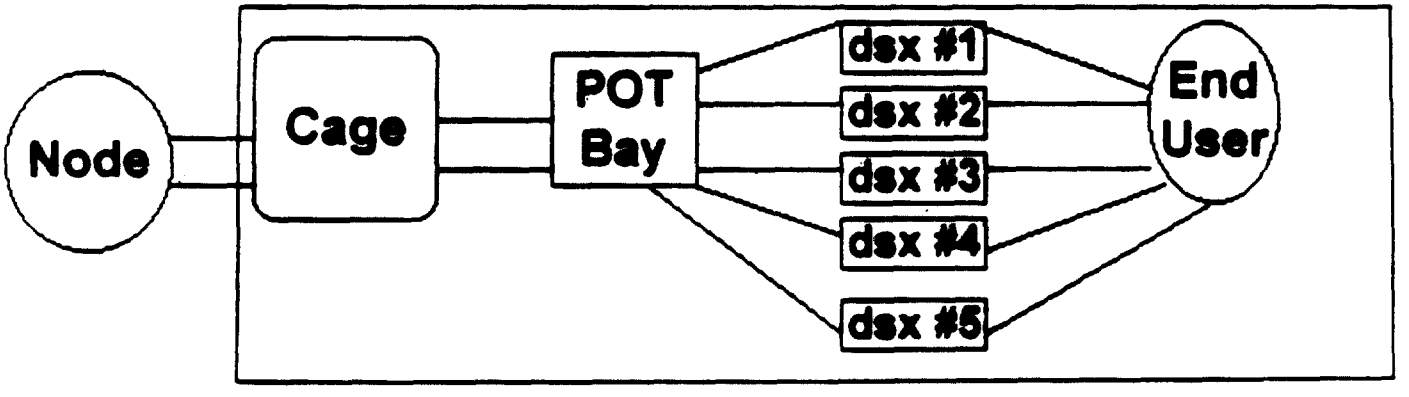
A recent news release issued by Teleport Communications Group (TCG), entitled "The POT Bay: Several BOCs Attempt to Obstruct Interconnection ...Again," has prompted the NTCs to explain, once again, the rationale behind the use of a POT Bay.

We believe at the conclusion of this paper, that you will understand why the POT Bay is necessary in a physical collocation arrangement and the NTCs charges in connection with the POT Bay are just and reasonable.

The NYNEX definition of a POT Bay:

A POT Bay serves as a termination point for each type of service ordered by the interconnector (i.e DS1, DS3). As the NTCs began developing their methods and procedures for implementing physical collocation, it became apparent that establishing a single point of termination in the central office, where the interconnector could obtain access to all of the services desired, was the most efficient way to provide these services.

The POT is established at or near the multiplexing node. This allows each interconnector to perform its activities at a single location.



Interconnector Maintains Control:

The interconnector has control over cross connects at the Point of Termination (POT) that is installed at the multiplexing node as the point of demarcation between the LEC and the interconnector. Thus, the interconnector can control channel assignments at three points; at the POT Bay, inside the multiplexing node, or at the interconnectors' node in its own network. The NTCs have used the same channel assignment procedures in the state expanded interconnection arrangements since April, 1991 without problems for either the NTCs or interconnectors.

Alternatives to the POT Bay:

As an alternative to the POT Bay, TCG suggests that LECs allow interconnectors to connect directly to the LECs Main Distribution Frame (MDF). This is an inefficient practice. For example, at one NTC location, if the interconnector was permitted to designate multiple points of termination, the NTCs might have to establish up to 30 demarcation point locations by assigning frame termination space on any of twenty-three possible frames located on various floors throughout the building. This process would burden the interconnector with increased costs for LEC escorts as well as increased maintenance fees. The following example illustrates the potential number of demarcation points within the New York Telephone Broad St. location.

Alternatives to the POT Bay: (continued)

Frame Type	No. of Pos. Frames	Termination Levels	No. of Demarcation Points
DSX-1	5	DS1	5
DSX-3	3	DS3	3
Subscriber MDF	4	DS0	4
Tie Pair DF	4	DS0	4
Trunk MDF	2	DS0,DS1	4
Toll DF	4	DS0,DS1	8
Special Service DF	2	DS0,DS1	2
Total	23		30

Without a POT Bay, interconnectors could potentially have to check many demarcations points within one central office to isolate trouble. The POT Bay eliminates this excessive cost burden, and inefficiency for both the interconnector and the NTC.

Not a
New Issue:

This issue was raised by TCG during the course of the New York State Public Service Commission's (NYSPSC) deliberations over New York Telephone's (NYT) OTIS II tariff. The NYSPSC, in responding to TCGs comments on the POT Bay, stated "The vague references by Teleport to the possibility of operational difficulties, is clearly overshadowed by NYT's explanation of the additional operational benefits of having one point of interconnection for each facility type in every central office." (1)

(1) State of New York Public Service Commission Order Regarding OTIS II Compliance Filing Issued and Effective May 8, 1991.

Cost the
True Story:

In their POT Bay paper, TCG states that "the POT Bay unnecessarily adds exorbitant costs to interconnection." TCG compares the rates of the NTCs to those charged by other carriers. The NTCs' charges are not unjust and unreasonable. The NTCs do not charge a non-recurring charge for the construction of a POT Bay, while their recurring rate is included as part of the monthly Office Channel Termination charge (OCT). For example, currently, a DS1 OCT is $6.16, of this OCT, the POT Bay comprises about 60% of the cost of the OCT, or $3.70.

TCG also claims that since nothing is regularly "done" by the LEC to the POT Bay, they see no justification for a recurring charge. In fact, monthly recurring charges for the use of equipment are established to recover the investment costs and related overheads associated with that equipment. Whether something is regularly "done" to that equipment is irrelevant.

What Next?

The NTCs have been a leader in opening the doors to competition in both the intralata and interlata markets. The POT Bay is not an unnecessary element and serves an essential purpose for both the interconnector and the NTCs. The NTCs will continue to meet the needs of our interconnector customers and work within the given regulatory framework to accomplish these goals.